

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

JOSEPH R. GOODWIN
UNITED STATES DISTRICT JUDGE

CHARLESTON DIVISION

**IN RE: AMERICAN MEDICAL SYSTEMS, INC.
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION**

MDL No. 2325
Honorable Joseph R. Goodwin

CHARLOTTE BUDGE,

Plaintiff,

V.

**AMERICAN MEDICAL SYSTEMS,
INC.,**

Defendant.

§ 87(2)(b)

CIVIL ACTION NO. 2:13-cv-33527

MOTION TO TRANSFER MDL

COME NOW the plaintiff(s), by and through the undersigned counsel, and move the court to transfer this member case from MDL 2325, In re: American Medical Systems, Inc. Pelvic Repair System Products Liability Litigation, to:

MDL 2327, In re: Ethicon, Inc. Pelvic Repair System Products Liability Litigation

Plaintiff(s) herein filed a Complaint or Short Form Complaint in MDL 2325 against American Medical Systems, Inc. and others. Plaintiff(s) later filed an Amended Short Form Complaint that no longer included American Medical Systems, Inc. or another named defendant in that litigation; included instead, among others, were the following parties from MDL 2327:

Ethicon, Inc. and Johnson & Johnson

Because American Medical Systems, Inc. or another defendant named in the Master Complaint, is no longer a named defendant in this member case, Plaintiff(s) respectfully request that the Court: 1) **GRANT** the Plaintiff(s) motion to transfer this civil action from MDL 2325 to 2327; and 2) direct the Clerk to disassociate this civil action as a member case in MDL 2325 and re-associate it with MDL 2327.

Respectfully submitted,

/s/ J. Steve Mostyn

J. Steve Mostyn

Mark Sparks

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this member case.

/s/ J. Steve Mostyn

J. Steve Mostyn